

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-122-LPS
	)	
GROUPON, INC.,	)	
	)	
Defendant.	)	

**MOTION OF GROUPON, INC. TO  
EXCLUDE EXPERT TESTIMONY OF DR. JERRY A. HAUSMAN**

*Of Counsel:*

J. David Hadden  
Saina S. Shamilov  
Phillip J. Haack  
Sapna Mehta  
FENWICK & WEST LLP  
Silicon Valley Center  
801 California Street, 12th Floor  
Mountain View, CA 94041  
(650) 988-8500

ASHBY & GEDDES  
John G. Day (#2403)  
Andrew C. Mayo (#5207)  
500 Delaware Avenue, 8th Floor  
P.O. Box 1150  
Wilmington, DE 19899  
(302) 654-1888  
jday@ashbygeddes.com  
amayo@ashbygeddes.com  
  
*Attorneys for Defendant Groupon, Inc.*

Dated: March 5, 2018

Defendant Groupon, Inc. (“Groupon”) respectfully moves this Court for entry of an order excluding the expert testimony of IBM’s damages expert, Dr. Jerry A. Hausman. Groupon moves pursuant to Federal Rule of Evidence 702, *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), and the Court’s Scheduling Order (D.I. 17 ¶ 8(f)(iii)).

The grounds for this Motion are set forth in the Memorandum in Support of Motion to Exclude Expert Testimony of Dr. Jerry A. Hausman, filed herewith. A proposed order is attached.

ASHBY & GEDDES

/s/ John G. Day

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